

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| CHEVRON CORPORATION, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | 11 Civ. 0691 (LAK) |
| | : | |
| STEVEN DONZIGER, <i>et al.</i> , | : | |
| | : | |
| Defendants. | : | |
| ----- | X | |

**NOTICE OF CHEVRON CORPORATION'S MOTION TO HOLD
AARON MARR PAGE AND FORUM NOBIS PLLC IN CONTEMPT OF COURT FOR
THEIR VIOLATION OF THE RICO AND DEFAULT JUDGMENTS**

GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

STERN, KILCULLEN & RUFOLO LLC
325 Columbia Tpke, Ste 110
P.O. Box 992
Florham Park, New Jersey 07932-0992
Telephone: 973.535.1900
Facsimile: 973.535.9664

Attorneys for Plaintiff Chevron Corporation

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Chevron Corporation's ("Chevron") Motion to Hold Aaron Marr Page and Forum Nobis PLLC in Contempt of Court for Their Violation of the RICO and Default Judgments; the Declaration of Anne Champion, dated August 28, 2019; the Declaration of John A. Slavek, dated August 28, 2019; and the Declaration of Spencer Lynch, August 28, 2019; and all prior pleadings and proceedings in this matter, Chevron respectfully moves this Court for entry of an order holding Page and Forum Nobis PLLC in civil contempt pursuant to Federal Rule of Civil Procedure 70(e) and Local Civil Rule 83.6 of the Local Rules of the United States District Court for the Southern District of New York.

To bring Page and Forum Nobis PLLC into compliance with the RICO Judgment (Dkt. 1875) and the Default Judgment (Dkt. 1985), Chevron seeks an order requiring that Page and Forum Nobis PLLC: (i) compensate Chevron by entering a judgment holding them jointly and severally liable with Donziger for the money judgments entered by this Court against Donziger in the contempt proceedings against him in the amounts of \$666,476.36 and \$3,433,384.30, and entering a judgment against Page and Forum Nobis for the \$342,045.16 that they transferred to Donziger (recognizing and accounting for the fact that \$31,554.71 of this \$342,045.16 is contained within the judgment for \$666,476.34 (Slavek Decl. ¶¶ 7–8, Ex. 2)); and (ii) assign any and all interests in the Ecuadorian judgment to Chevron. The Court should also award Chevron its attorneys' fees related to the acts of willful contempt by Page and Forum Nobis, including fees Chevron incurred in uncovering their contempt and in bringing this motion.

Dated: August 28, 2019
New York, New York

Respectfully submitted,
GIBSON, DUNN & CRUTCHER LLP

/s/ Randy M. Mastro

Randy M. Mastro
Andrea E. Neuman
200 Park Avenue
New York, New York 10166
Telephone: 212.351.4000
Facsimile: 212.351.4035

William E. Thomson
333 South Grand Avenue
Los Angeles, California 90071
Telephone: 213.229.7000
Facsimile: 213.229.7520

STERN, KILCULLEN & RUFOLO LLC
Herbert J. Stern
Joel M. Silverstein
325 Columbia Tpke, Ste 110
P.O. Box 992
Florham Park, New Jersey 07932-0992
Telephone: 973.535.1900
Facsimile: 973.535.9664

Attorneys for Chevron Corporation